

W E I T Z
&
L U X E N B E R G
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January 10, 2018

Regional Freedom of Information Officer
U.S. EPA, Region 5
77 West Jackson Boulevard (M1-9J)
Chicago, IL 60604-3590
Phone: (312) 886-6686

Re: Freedom of Information Act Request

Dear FOIA Officer:

Weitz & Luxenberg, P.C. files this request under the Freedom of Information Act. Weitz & Luxenberg seeks the following documents:

- 1) All reports, photographs, and documents related to Wolverine Worldwide's disposal of material containing per- and polyfluoroalkyl substances ("PFAS")¹ and the migration of PFAS from any Wolverine Worldwide disposal sites.
- 2) All reports, data, tests, risk assessments, analyses, and documents pertaining to environmental sampling and monitoring for PFAS in the vicinity of Kent County, Mecosta County, and Montcalm County, Michigan, including sampling of soil, groundwater, residential wells, and municipal water.

¹ Per- and polyfluoroalkyl substances are referred to as "PFAS" and include perfluorooctane sulfonate ("PFOS") and perfluorooctanoic acid ("PFOA").

- 3) All reports, data, tests, risk assessments, analyses, and documents pertaining to environmental sampling and monitoring for PFAS of the surface water in the vicinity of Kent County, Mecosta County, and Montcalm County, Michigan, including but not limited to Little Pine Island Lake, Muskegon River, Rogue River, and Rum Creek.
- 4) All reports, data, tests, risk assessments, analyses, and documents pertaining to the location and testing for PFAS of any monitoring wells in the vicinity of Kent County, Mecosta County, and Montcalm County, Michigan.
- 5) All documents, and other materials related to future testing of wells and suspected PFAS contamination sites in the vicinity of Kent County, Mecosta County, and Montcalm County, Michigan.
- 6) All documents and maps pertaining to the PFAS contamination zones, testing zones, and investigation areas in the vicinity of Kent County, Mecosta County, and Montcalm County, Michigan.
- 7) All documents and communications with, from or on behalf of Wolverine Worldwide, The 3M Company, and Waste Management relating to the use, disposal, or migration of PFAS at facilities in the vicinity of Kent County, Mecosta County, and Montcalm County, Michigan.
- 8) All documents and communications with, from or on behalf of Wolverine Worldwide, The 3M Company, and Waste Management relating to the presence of PFAS in the soil, groundwater, surface water, and wells in the vicinity of Kent County, Mecosta County, and Montcalm County, Michigan.

For purposes of this request, "document(s)" is used in the broadest sense of the word and includes all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, electronic communications (existing in hard copy and/or in electronic storage), invoices, contracts, agreements, manuals, publications, photographs of all types, and mechanical, magnetic, and electronic records or recordings of any kind.

Should the you decide to charge a fee, Weitz & Luxenberg will pay fees for this request up to a maximum of \$1,000.00. If you estimate that the fees will exceed this limit, Weitz & Luxenberg asks that the you obtain authorization from Weitz & Luxenberg before delivery of any materials. We request that the information we seek be provided in electronic format, and would like to receive it on a CD-ROM.

If you have any questions about the scope of this request, or if you believe there are any ambiguities in the way Weitz & Luxenberg has framed its request, please let me know as soon as possible.

Thank you for your very prompt attention to this matter.

Sincerely,



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